



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, Washington 98504-7600 • 360-407-6300

September 19, 2025

Conor Hansen
SRMAH Nuovo LLC
111 N Post St, Ste 200
Spokane, WA 99201
conor@srmdevelopment.com

Re: No Further Action opinion for the following contaminated Site

Site name: Eastside Disposal
Site address: 969 118th Avenue SE, Bellevue, WA 98005
Facility/Site ID: 9271127
Cleanup Site ID: 7835
VCP Project No.: NW3415

Dear Conor Hansen:

The Washington State Department of Ecology (Ecology) received your request on November 16, 2024, for an opinion regarding the sufficiency of your independent cleanup of the Eastside Disposal facility (Site) under the [Voluntary Cleanup Program \(VCP\)](#).¹ This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), chapter [70A.305](#)² RCW.

Opinion

Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in chapter 70A.305 RCW and chapter [173-340 WAC](#)³ (collectively called “MTCA”).

¹ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

² <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

³ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340>

Site Description

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release(s):

- Gasoline, diesel, oil, and benzene in soil and groundwater.

Appendix A includes Site description and diagrams.

Please note that releases from multiple sites can affect a parcel of real property. At this time, Ecology has no information that other sites affect the parcel(s) associated with this Site.

Basis for the Opinion

Ecology bases this opinion on the information in the documents listed in **Appendix B**.

You can request these documents by filing a [records request](#).⁴ For help making a request, contact the Public Records Officer at publicrecordsofficer@ecy.wa.gov or call 360-407-6040. Before making a request, check whether the documents are available on [Ecology's Cleanup and Tank Search web page](#).⁵

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

Ecology has concluded that no further remedial action is necessary to clean up contamination at the Site. Ecology bases its conclusion on the following analysis:

Characterizing the Site

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action. Appendix A describes the Site.

Soil

The vertical and lateral extent of soil contamination prior to the 2012 excavation is shown in figures 3 and 4 in Appendix A. The results of the excavation are given in tables 3 through 6.

⁴ <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

⁵ <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=7835>

Groundwater

In September and December of 2022 and March and June of 2023, four rounds of groundwater monitoring of the eight wells on site were done. The samples were analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, xylene, and arsenic.

Table 1. Groundwater samples – 2022/2023

Contaminant	MTCA Method A/B Cleanup Level (µg/l)	Maximum Concentration (µg/l)	Number of Exceedances/ Number of Samples	Number of Detections/ Number of Samples
Gasoline	800	none	0/32	0/32
Diesel	500	540*	1/32	25/32
Oil	500	430	0/32	1/32
Benzene	5	none	0/32	0/32
Ethylbenzene	700	none	0/32	0/32
Toluene	1,000	none	0/32	0/32
Xylene	1,000	none	0/32	0/32
Arsenic	5.0/8.0 [†]	12 [‡]	10/16	15/16

µg/l = micrograms per liter

* **Note:** When reanalyzed following a silica gel cleanup, all diesel and oil concentrations were nondetectable. The maximum concentration was less than the screening level of 700 µg/L of polar compounds from Ecology’s Silica Gel Cleanup Guidance

† Cleanup is not required under MTCA for arsenic concentrations in groundwater above the Method A cleanup level of 5.0 µg/L but below the regional background concentration of 8.0 µg/L.

‡ **Note:** Arsenic concentrations fell in the same range as were measured in 2013 (12 µg/L or less). Arsenic concentrations exceeding the Puget Sound Basin regional background concentration of 8.0 µg/L are likely due to a naturally occurring peat layer causing geochemically reducing conditions in groundwater that results in mobilization of naturally occurring arsenic in soils. Such elevated arsenic concentrations are therefore believed to be naturally occurring and are therefore not regulated under MTCA.

Setting cleanup standards

Cleanup standards include cleanup levels, points of compliance, and applicable local laws and requirements. Ecology has determined the following cleanup levels set for the Site meet the substantive requirements of MTCA.

Table 2. Cleanup levels for soil and groundwater

Hazardous Substance	Method A Soil (mg/kg)	Method A Groundwater (µg/l)
Gasoline	30/100	800/1,000
Diesel	2,000	500
Oil	2,000	500
Benzene	0.03	5
Ethylbenzene	6	700
Toluene	7	1,000
Xylene	9	1,000
Arsenic	20	5.0/8.0*

mg/kg = milligrams per kilogram.

* Cleanup is not required under MTCA for arsenic concentrations in groundwater above the Method A cleanup level of 5.0 µg/L but below the regional background concentration of 8.0 µg/L.

The standard horizontal point of compliance for soil and groundwater is throughout the Site.

The standard vertical point of compliance for the direct-contact pathway for soils is fifteen feet below the ground surface (ft bgs). Soils deeper than fifteen feet are considered protective for direct contact with the contaminated soil.

A standard vertical point of compliance, from the uppermost level of the saturated zone to the lowest depth that could potentially be affected, was used for groundwater contamination.

Selecting the cleanup action

Ecology has determined the cleanup action you selected for the Site meets the substantive requirements of MTCA.

Ecology's Model Remedy 1 for Petroleum-contaminated Sites was applied.

Contaminated soil was excavated and taken offsite to a permitted facility. Since contaminant concentrations in groundwater were below site cleanup levels, no remedial actions for groundwater were necessary.

The Site has been re-developed as an affordable housing development.

Implementing the cleanup action

Ecology has determined your cleanup meets the standards set for the Site.

In October of 1989, two gasoline tanks, 500 and 2,000 gallons, were excavated and taken offsite to a permitted facility. A total of 790 cubic yards of contaminated soil were stockpiled onsite (final disposition not known). Verification samples were collected and analyzed for benzene, ethylbenzene, toluene, and xylene. Report unclear as to which verification samples were over-excavated. Some contaminated soil was left onsite.

In November of 1989, a 1,000-gallon diesel tank was excavated and taken offsite to a permitted facility. A total of 380 cubic yards of contaminated soil were taken offsite. Contaminated soil beneath the welding shop (Former Storage Building) was left in place. Ten verification soil samples were collected and analyzed for total petroleum hydrocarbons. The report was unclear as to which samples were over-excavated. Some contaminated soil was left onsite.

In August of 2012, four areas of concern, one west (Area 4) of the Main Building, one north of the Former Storage Building (Area 1), and two areas south of the Former Storage Building (Areas 2 and 5), were excavated and the soil taken offsite to a permitted facility— 2,122 tons of soil from Area 1; 1,274 tons of soil from Area 2; 126 tons of soil from Area 4; and 1,360 tons from Area 5, totaling 4,882 tons of contaminated soil.

As Areas 1 and 2 included the locations where the underground storage tanks were removed in 1989, the contaminated soil left in place then was removed. (see figures 5 and 6).

Nineteen verification samples were collected from Area 1 and analyzed for gasoline, benzene, ethylbenzene, toluene, and xylene. One sample was analyzed for lead. Lead was not detected in the sample.

Fifteen verification samples were collected from Area 2 and analyzed for diesel and oil, with one sample also analyzed for gasoline, benzene, ethylbenzene, toluene, and xylene.

Ten verification samples were collected from Area 4 and analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene. Two samples were also analyzed for lead. Lead was not detected in either sample.

Twenty-four verification samples were collected from Area 5 and analyzed for diesel and oil.

Table 3. Verification Soil Samples – Area 1

Contaminant	MTCA Method A/B Cleanup Level (mg/kg)	Maximum Concentration (mg/kg)	Number of Exceedances/ Number of Samples	Number of Detections/ Number of Samples
Gasoline	30/100	8.6	0/19	3/19
Benzene	0.03	0.04*	1/19	2/19
Ethylbenzene	6	none	0/19	0/19
Toluene	7	none	0/19	0/19
Xylene	9	0.178	0/19	1/19

* Note: A calculation of the 95% upper confidence level (0.017 mg/kg) using a statistical analysis of the benzene data showed that the value was below the site cleanup level.

Table 4. Verification Soil Samples – Area 2

Contaminant	MTCA Method A/B Cleanup Level (mg/kg)	Maximum Concentration (mg/kg)	Number of Exceedances/ Number of Samples	Number of Detections/ Number of Samples
Gasoline	30/100	none	0/1	0/1
Diesel	2,000	210	0/15	5/15
Oil	2,000	480	0/15	5/15
Benzene	0.03	none	0/1	0/1
Ethylbenzene	6	none	0/1	0/1
Toluene	7	none	0/1	0/1
Xylene	9	none	0/1	0/1

Table 5. Verification Soil Samples – Area 4

Contaminant	MTCA Method A/B Cleanup Level (mg/kg)	Maximum Concentration (mg/kg)	Number of Exceedances/ Number of Samples	Number of Detections/ Number of Samples
Gasoline	30/100	none	0/10	0/10
Diesel	2,000	1,900	0/10	3/10
Oil	2,000	1,200	0/10	3/10
Benzene	0.03	none	0/10	0/10
Ethylbenzene	6	none	0/10	0/10
Toluene	7	none	0/10	0/10
Xylene	9	none	0/10	0/10

Table 6. Verification Soil Samples – Area 5

Contaminant	MTCA Method A/B Cleanup Level (mg/kg)	Maximum Concentration (mg/kg)	Number of Exceedances/ Number of Samples	Number of Detections/ Number of Samples
Diesel	2,000	430	0/24	3/24
Oil	2.000	1,800	0/24	13/24

In February of 2016, a 1,000-gallon tank was excavated and taken offsite, along with 2,055 tons of contaminated soil, to a permitted facility. Eleven confirmational soil samples were collected, with six samples being analyzed for gasoline, benzene, ethylbenzene, toluene, and xylene. Five soil samples were analyzed for the same analytes plus diesel and oil. Two samples were analyzed for lead. Lead was not detected in either sample

Table 7. Verification Soil Samples – 2016

Contaminant	MTCA Method A/B Cleanup Level (mg/kg)	Maximum Concentration (mg/kg)	Number of Exceedances/ Number of Samples	Number of Detections/ Number of Samples
Gasoline	30/100	30	0/11	1/11
Diesel	2,000	1,800	0/5	3/5
Oil	2.000	150	0/5	1/5
Benzene	0.03	none	0/11	0/11
Ethylbenzene	6	0.1	0/11	1/11
Toluene	7	none	0/11	0/11
Xylene	9	0.12	0/11	3/11

Ecology has concluded that all soil contamination above Method A cleanup levels has been removed and properly disposed of offsite.

You must decommission [resource protection wells](#)⁶ installed as part of the remedial action that are not needed for any other purpose at the Site. Wells must be decommissioned in accordance with WAC [173-160-460](#).⁷

Listing of the Site

Based on this opinion, Ecology will initiate the process of removing the Site from the Contaminated Sites List and the Leaking Underground Storage Tank (LUST) list. The Site will be added to the No Further Action sites list.

⁶ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-410>

⁷ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-460>

Limitations of the Opinion

Opinion does not settle liability with the state

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion does not:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW [70A.305.040](#)⁸(4).

Opinion does not constitute a determination of substantial equivalence

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine if the action you performed is substantially equivalent. Courts make that determination. See RCW [70A.305.080](#)⁹ and WAC [173-340-545](#).¹⁰

State is immune from liability

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW [70A.305.170](#)¹¹(6).

⁸ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

⁹ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

¹⁰ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

¹¹ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

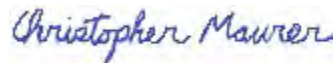
Termination of Agreement

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. NW3415.

Questions

If you have any questions about this opinion or the termination of the Agreement, please contact me at 360-407-7223 or christopher.maurer@ecy.wa.gov.

Sincerely,



Christopher Maurer, P.E.
Cleanup Project Manager
Headquarters Section

Appendices (3): A – Site Description and Diagrams
B – Basis for the Opinion: Documents List
C – Previous Site Characterization

cc by email: Jerry Boyd, TRC Environmental, jboyd@trccompanies.com
Amy Hargrove, Ecology, amy.hargrove@ecy.wa.gov
Treasure Mitchell, Ecology, treasure.mitchell@ecy.wa.gov
Fiscal, VCP Fiscal Analyst, ecyrevcp@ecy.wa.gov
Ecology Site file

Appendix A

Site Description and Diagrams

Site Background Information

The Subject Property formerly consisted of three contiguous parcels that were accessed from one driveway off 118th Avenue SE:

- Parcel No. 939970-0820.
- Parcel No. 042405-9057.
- Parcel No. 042405-9083.

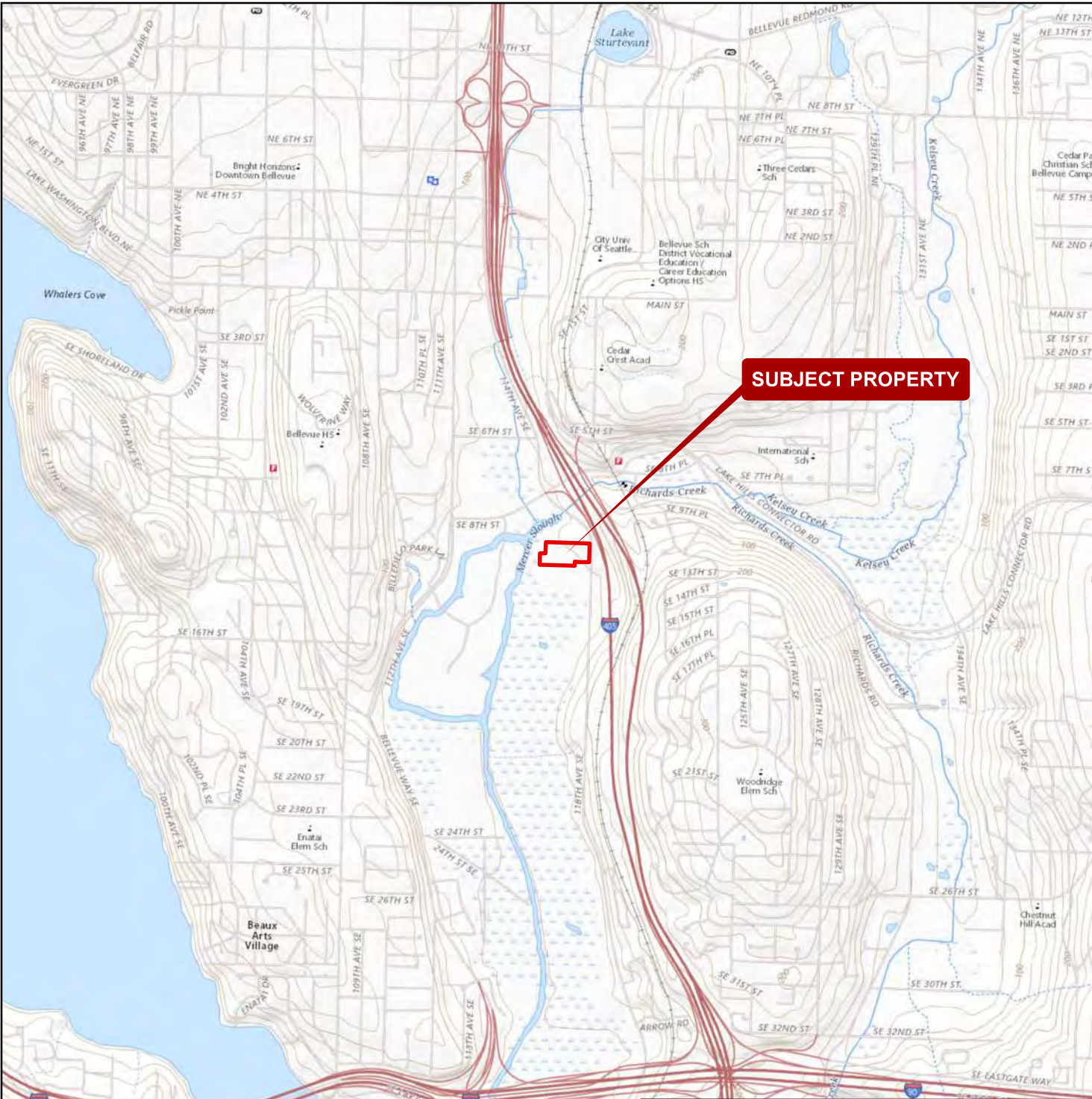
The three parcels were consolidated as one during the redevelopment activities as parcel No. 939970-0820, which has a total acreage of 3.54 acres. In 2023, the parcel was numbered as 609365-0000.

Legal description: 991 118th AVE SE Condo, Volume 347 Page 28, records of King County

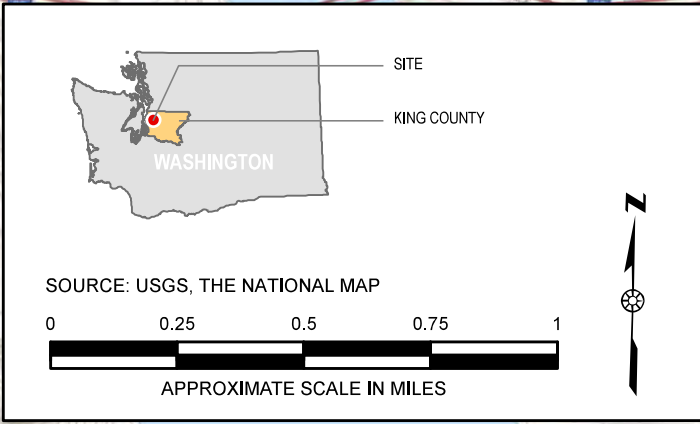
No legal description is available on the King County Assessor's website.

Figures

Figure 1	Site Location Map
Figure 2	Site Representation
Figure 3	Main Building Boring Locations and Results
Figure 4	Former Storage Building Boring Locations, Results and Estimated Extent of Impacts
Figure 5	2013 AOPC-1 Final Performance Soil Samples
Figure 6	2013 AOPC-2 Final Performance Soil Samples
Figure 7	2013 AOPC-4 Limits of Remedial Excavation and Soil Sampling Results
Figure 8	2013 AOPC-5 Final Performance Soil Samples
Figure 9	Cross-section Alignment
Figure 10	Cross-section A-A'
Figure 11	Cross-section B-B'
Figure 12	Former Main Building Site: Limits of 2016 Remedial Excavation and Soil Analytical Results
Figure 13	Monitoring Well Locations
Figure 14	2022/2023 Groundwater Gradients
Figure 15	2023 Soil Boring Locations
Figure 16	Diesel Tank Excavation
Figure 17	Gasoline Tank Excavation



SUBJECT PROPERTY



1180 NW MAPLE ST, SUITE 310
 ISSAQUAH, WA 98027
 425.395.0010
 WWW.TRCCOMPANIES.COM

FIGURE 1
 SITE LOCATION MAP

REPORT
 DATA GAP INVESTIGATION
 WORK PLAN

PREPARED FOR
 PIONEER DEVELOPMENT CORP. INC.

LOCATION
 969 118TH AVENUE SE BELLEVUE,
 WASHINGTON

PROJECT NUMBER
 384144

DATE 1/28/21
DRAWN BY VPB
REVIEWED BY DCK



KEY:

SOURCE: AERIAL PHOTOGRAPH OBTAINED FROM GOOGLE EARTH.



— SUBJECT PROPERTY BOUNDARY



APPROXIMATE SCALE: 1" = 100'



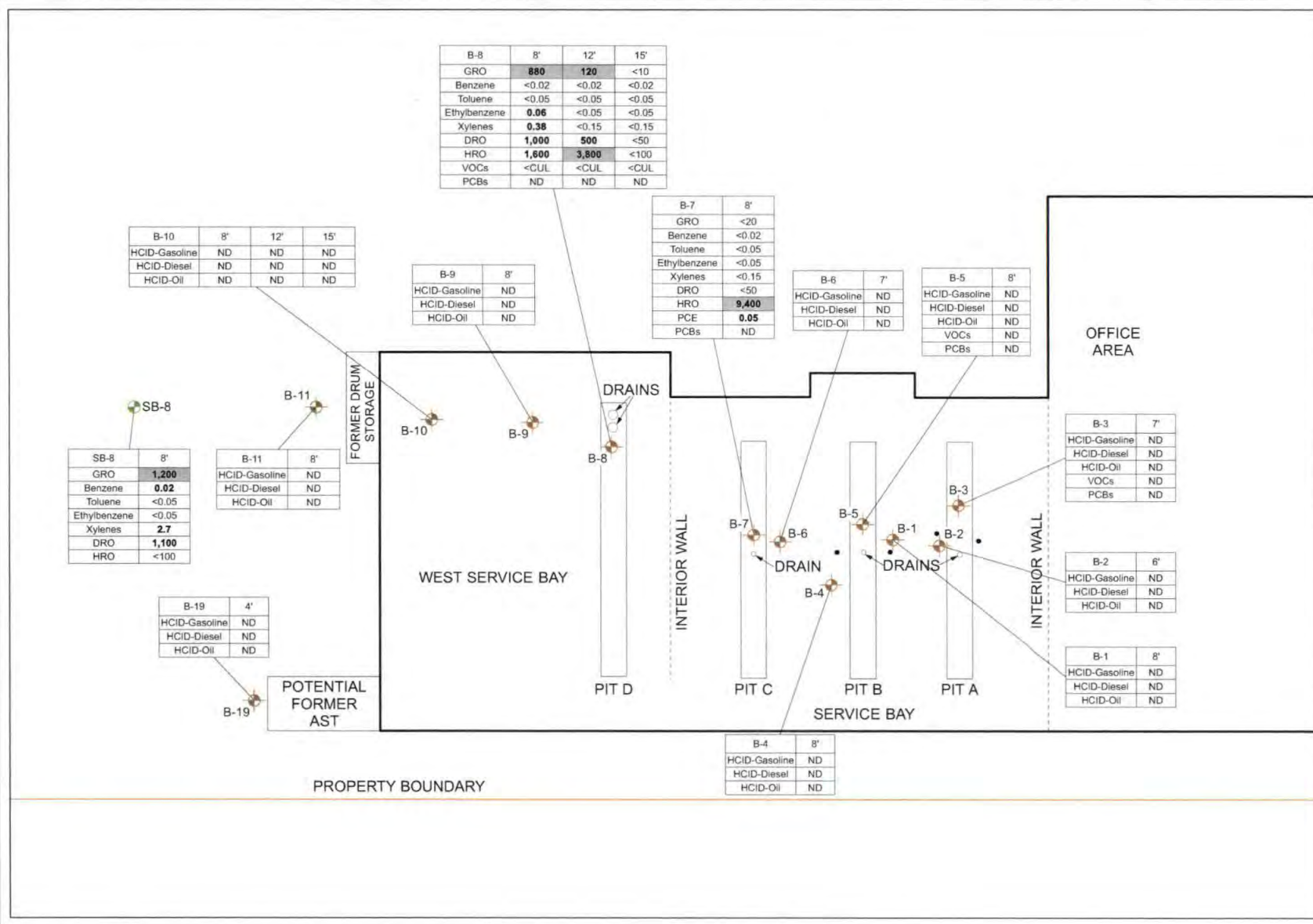
ENVIRONMENTAL PARTNERS INC

295 NE Gilman Boulevard, Suite 201
Issaquah, Washington 98027

FIGURE 2

SITE REPRESENTATION

PROJECT	62401.0		
PREPARED FOR	BUSS LLC		
LOCATION	969 118TH AVENUE SE BELLEVUE, WASHINGTON		
SHEET	DRAWN BY	REVIEWED BY	DATE
1 of 1	ARM	GAM	03/23/12



B-8	8'	12'	15'
GRO	850	120	<10
Benzene	<0.02	<0.02	<0.02
Toluene	<0.05	<0.05	<0.05
Ethylbenzene	0.06	<0.05	<0.05
Xylenes	0.38	<0.15	<0.15
DRO	1,000	500	<50
HRO	1,600	3,800	<100
VOCs	<CUL	<CUL	<CUL
PCBs	ND	ND	ND

B-10	8'	12'	15'
HCID-Gasoline	ND	ND	ND
HCID-Diesel	ND	ND	ND
HCID-Oil	ND	ND	ND

B-9	8'
HCID-Gasoline	ND
HCID-Diesel	ND
HCID-Oil	ND

B-7	8'
GRO	<20
Benzene	<0.02
Toluene	<0.05
Ethylbenzene	<0.05
Xylenes	<0.15
DRO	<50
HRO	9,400
PCE	0.05
PCBs	ND

B-6	7'
HCID-Gasoline	ND
HCID-Diesel	ND
HCID-Oil	ND

B-5	8'
HCID-Gasoline	ND
HCID-Diesel	ND
HCID-Oil	ND
VOCs	ND
PCBs	ND

SB-8	8'
GRO	1,200
Benzene	0.02
Toluene	<0.05
Ethylbenzene	<0.05
Xylenes	2.7
DRO	1,100
HRO	<100

B-11	8'
HCID-Gasoline	ND
HCID-Diesel	ND
HCID-Oil	ND

B-19	4'
HCID-Gasoline	ND
HCID-Diesel	ND
HCID-Oil	ND

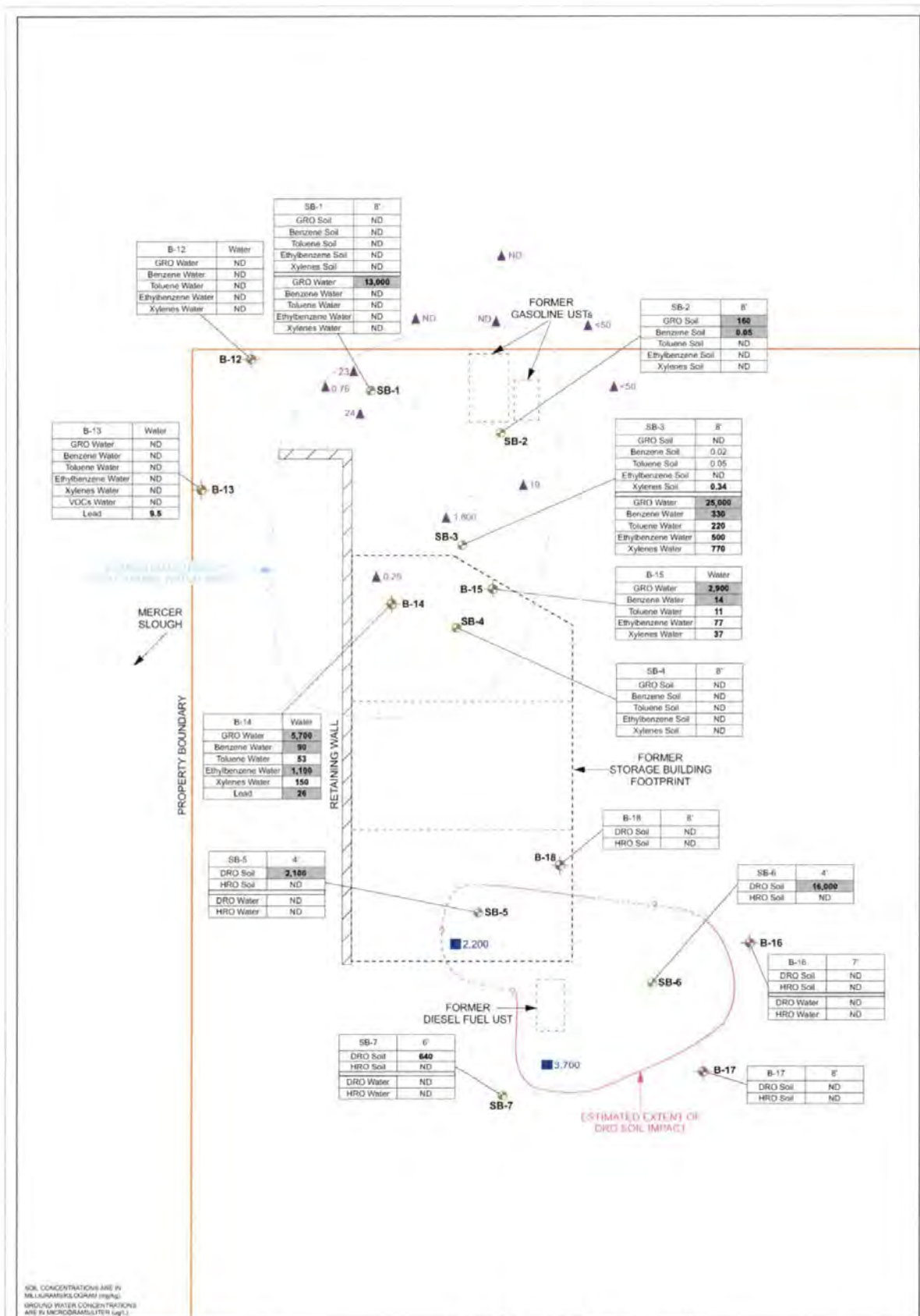
B-3	7'
HCID-Gasoline	ND
HCID-Diesel	ND
HCID-Oil	ND
VOCs	ND
PCBs	ND

B-2	6'
HCID-Gasoline	ND
HCID-Diesel	ND
HCID-Oil	ND

B-1	8'
HCID-Gasoline	ND
HCID-Diesel	ND
HCID-Oil	ND

B-4	8'
HCID-Gasoline	ND
HCID-Diesel	ND
HCID-Oil	ND

 ENVIRONMENTAL PARTNERS INC. <small>2475 E. Main Street, Suite 207 Olympia, Washington 98512</small>	PROJECT	624010	DATE	03/27/22
	PREPARED FOR	BUSS LLC	DRAWN BY	AWM
MAIN BUILDING BORING LOCATIONS AND RESULTS (FIGURE 3)	LOCATION	999 118TH AVENUE SE BELLEVUE, WASHINGTON	REVIEWED BY	GMF
	SHEET	1 of 1		
PROPERTY BOUNDARY SOIL BORING LOCATION COMPLETED 03/20/10 SOIL BORING LOCATION COMPLETED 12/07/12 AND 1/27/12 NOT DETECTED ABOVE THE LAB METHOD DETECTION LIMIT CONCENTRATION DETECTED BUT BELOW MTCA METHOD A SOIL CLEANUP LEVEL (CUL) CONCENTRATION ABOVE MTCA METHOD A SOIL CLEANUP LEVEL (CUL) METAL COVERS				
SB-8 B-1 ND BOLD AND SHADED				
 SCALE: 1" = 10'				



SOIL CONCENTRATIONS ARE IN MILLIGRAMS PER GRAM (mg/g).
GROUNDWATER CONCENTRATIONS ARE IN MICROGRAMS PER LITER (µg/L).



PROPERTY BOUNDARY

SOIL BORING LOCATION COMPLETED 8/30/10

SOIL BORING LOCATION COMPLETED 10/6/12 AND 1/27/13

BENZENE CONCENTRATION IN SOIL (1986)

TOTAL PETROLEUM HYDROCARBON CONCENTRATION IN SOIL (1986)

NOT DETECTED ABOVE THE LAB METHOD DETECTION LIMIT

CONCENTRATION DETECTED BUT BELOW MTC METHOD A 90% CLEANUP LEVEL (GUL)

CONCENTRATION ABOVE MTC METHOD A 90% CLEANUP LEVEL (GUL)

ENVIRONMENTAL PARTNERS INC.
291 N. Gates Street, Suite 201
Pasadena, Washington 98270

PROJECT 62401.0

PREPARED FOR BUSS LLC

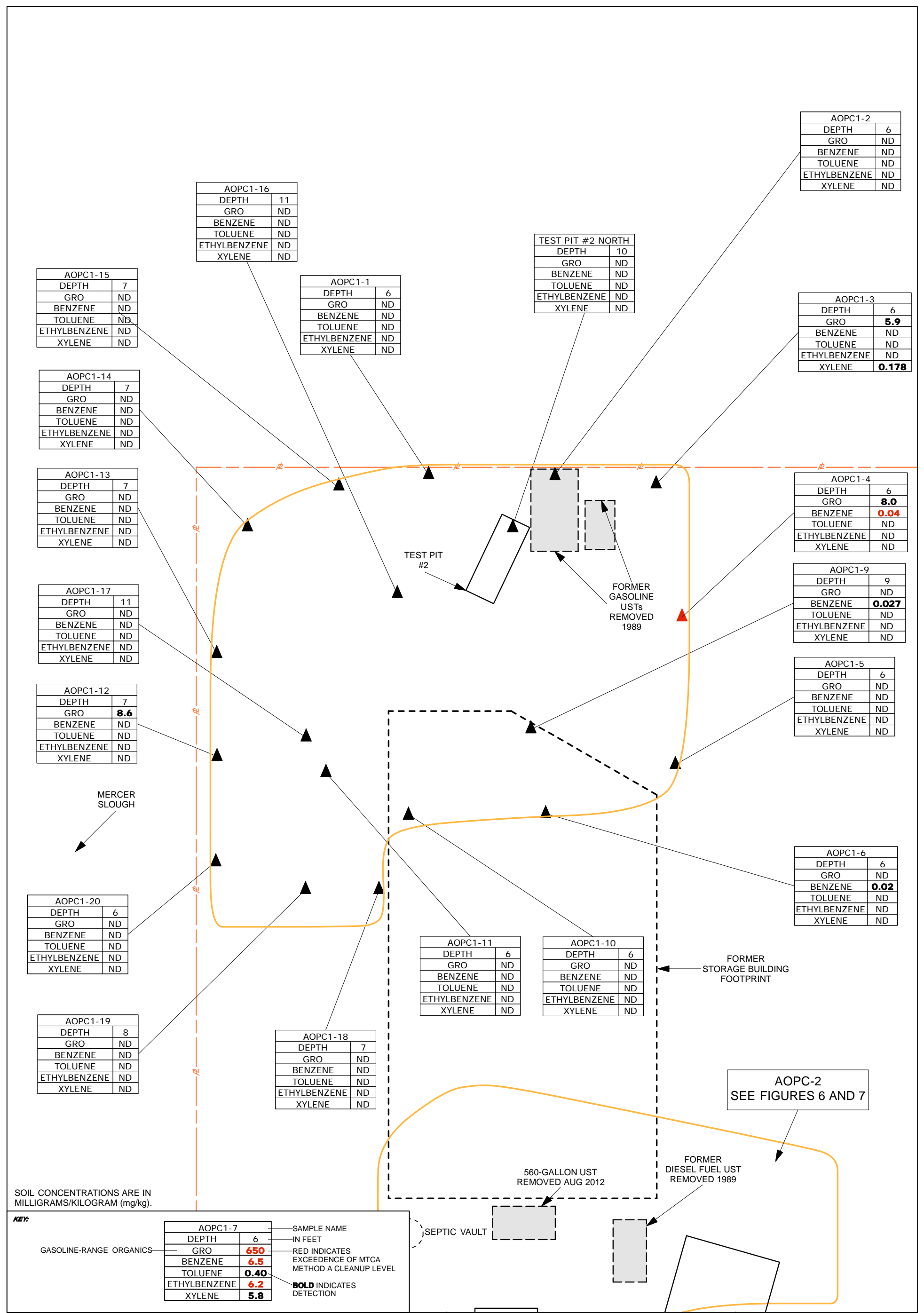
LOCATION 389 118TH AVENUE SE
BELLEVUE, WASHINGTON

SHEET 1 of 1

DRAWN BY AMB

REVIEWED BY GAM

DATE 02/23/12



AOPC1-2	
DEPTH	6
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-16	
DEPTH	11
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

TEST PIT #2 NORTH	
DEPTH	10
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-3	
DEPTH	6
GRO	5.9
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	0.178

AOPC1-1	
DEPTH	6
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-15	
DEPTH	7
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-14	
DEPTH	7
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-13	
DEPTH	7
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-4	
DEPTH	6
GRO	8.0
BENZENE	0.04
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-17	
DEPTH	11
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-9	
DEPTH	9
GRO	ND
BENZENE	0.027
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-12	
DEPTH	7
GRO	8.6
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-5	
DEPTH	6
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-6	
DEPTH	6
GRO	ND
BENZENE	0.02
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-20	
DEPTH	6
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-11	
DEPTH	6
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

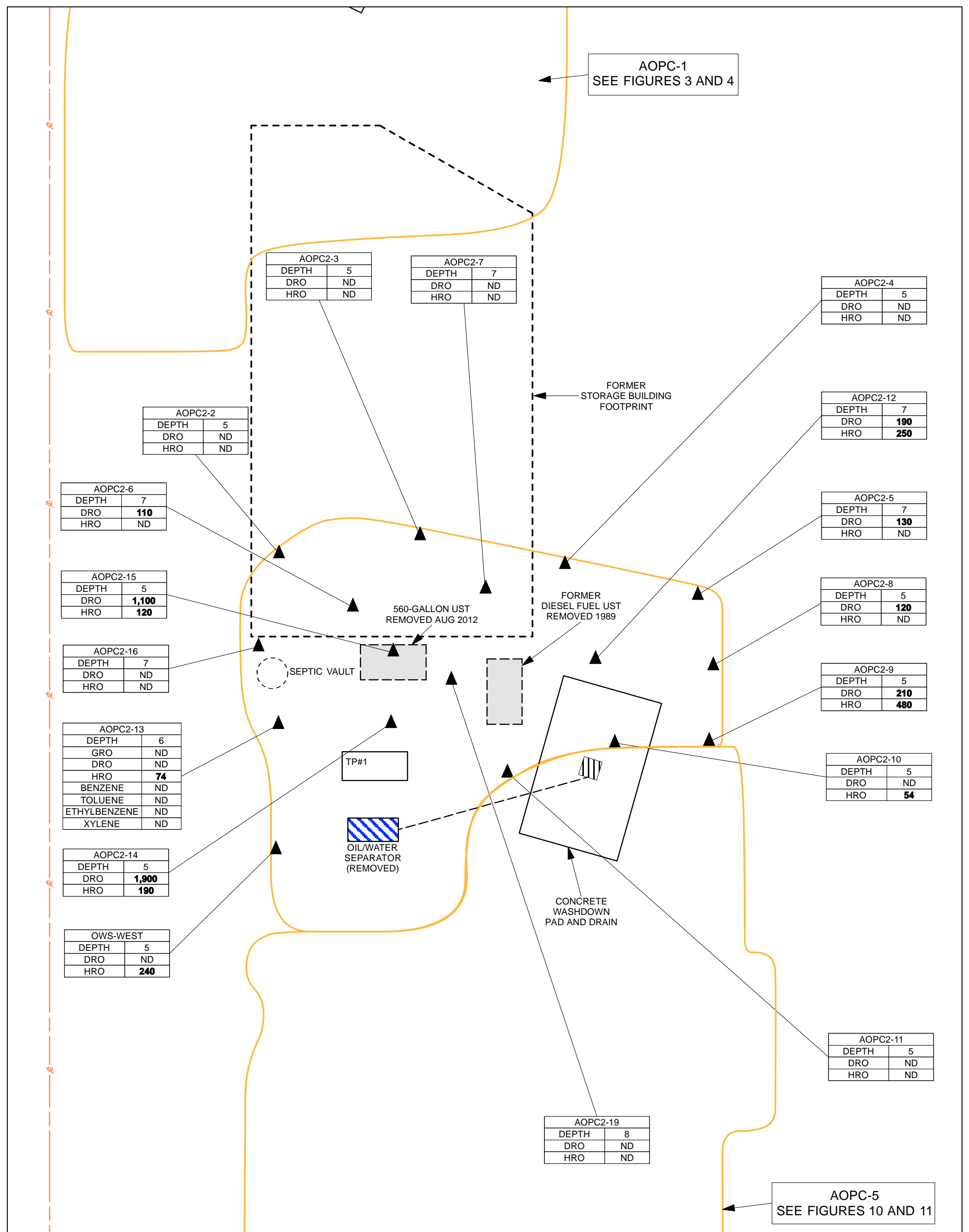
AOPC1-10	
DEPTH	6
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-19	
DEPTH	8
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC1-18	
DEPTH	7
GRO	ND
BENZENE	ND
TOLUENE	ND
ETHYLBENZENE	ND
XYLENE	ND

AOPC-2
SEE FIGURES 6 AND 7

<p>APPROXIMATE SCALE: 1" = 20'</p>	<p>KEY:</p> <p>——— LIMITS OF REMEDIAL EXCAVATION</p> <p>[---] FORMER UST LOCATIONS</p> <p>- - - - - PROPERTY LINE</p> <p>ND NOT DETECTED ABOVE THE LAB METHOD DETECTION LIMIT</p> <p>BOLD CONCENTRATION DETECTED BUT BELOW MTCA METHOD A SOIL CLEANUP LEVEL (CUL)</p> <p>RED CONCENTRATION ABOVE MTCA METHOD A SOIL CLEANUP LEVEL (CUL)</p>	<p>epl ENVIRONMENTAL PARTNERS INC</p> <p>295 NE Gilman Boulevard, Suite 201 Issaquah, Washington 98027</p> <p>FIGURE 5</p> <p>AOPC-1: FINAL PERFORMANCE SOIL SAMPLES</p>	<p>PROJECT 62401.1</p>
			<p>PREPARED FOR BUSS LLC</p>
		<p>LOCATION 969 118TH AVENUE SE BELLEVUE, WASHINGTON</p>	<p>SHEET 3 of 6</p>
		<p>DRAWN BY ALW</p>	<p>REVIEWED BY GAM</p>
		<p>DATE 1/11/13</p>	



SOIL CONCENTRATIONS ARE IN MILLIGRAMS/KILOGRAM (mg/kg).

KEY:

AOPC2-17		SAMPLE NAME
DEPTH	5	IN FEET
DRO	980	BOLD INDICATES DETECTION
HRO	6,200	RED INDICATES EXCEEDENCE OF MTCA METHOD A CLEANUP LEVEL

GASOLINE-RANGE ORGANICS
HIGHER-RANGE ORGANICS

KEY:

- LIMITS OF REMEDIAL EXCAVATION
- FORMER UST LOCATIONS
- PROPERTY LINE
- ND NOT DETECTED ABOVE THE LAB METHOD DETECTION LIMIT
- BOLD** CONCENTRATION DETECTED BUT BELOW MTCA METHOD A SOIL CLEANUP LEVEL (CUL)
- RED** CONCENTRATION ABOVE MTCA METHOD A SOIL CLEANUP LEVEL (CUL)

APPROXIMATE SCALE: 1" = 20'

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295 NE Gilman Boulevard, Suite 201
Issaquah, Washington 98027

FIGURE 6

AOPC-2:
FINAL PERFORMANCE
SOIL SAMPLES

PROJECT	62401.1		
PREPARED FOR	BUSS LLC		
LOCATION	969 118TH AVENUE SE BELLEVUE, WASHINGTON		
SHEET	DRAWN BY	REVIEWED BY	DATE
4 of 6	ALW	GAM	1/10/13

AOPC4-BOTTOM	
DEPTH	11
GRO	ND
DRO	250
HRO	240
BTEX	ND
LEAD	ND

AOPC4-NORTH	
DEPTH	8
GRO	ND
DRO	ND
HRO	ND
BTEX	ND
LEAD	NA

AOPC4-EAST	
DEPTH	8
GRO	ND
DRO	ND
HRO	ND
BTEX	ND
LEAD	NA

AOPC4-SOUTH	
DEPTH	8
GRO	ND
DRO	ND
HRO	ND
BTEX	ND
LEAD	NA

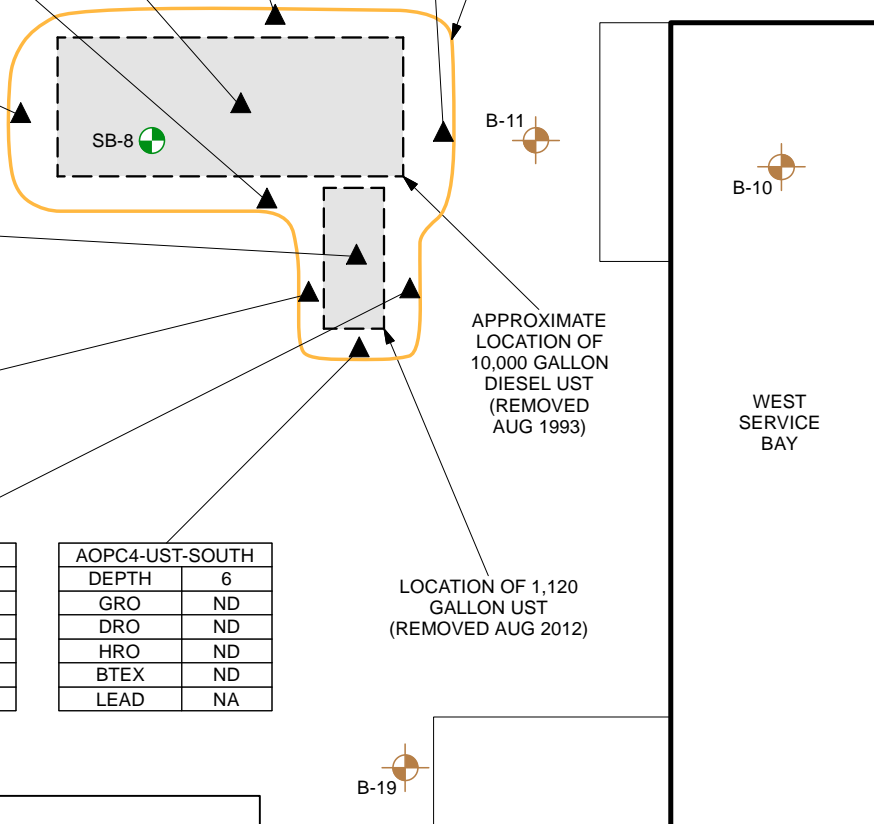
AOPC4-WEST	
DEPTH	8
GRO	ND
DRO	ND
HRO	ND
BTEX	ND
LEAD	NA

AOPC4-UST-BOTTOM	
DEPTH	8
GRO	ND
DRO	1900
HRO	1200
BTEX	ND
LEAD	ND

AOPC4-UST-WEST	
DEPTH	6
GRO	ND
DRO	200
HRO	180
BTEX	ND
LEAD	NA

AOPC4-UST-EAST	
DEPTH	6
GRO	ND
DRO	ND
HRO	ND
BTEX	ND
LEAD	NA

AOPC4-UST-SOUTH	
DEPTH	6
GRO	ND
DRO	ND
HRO	ND
BTEX	ND
LEAD	NA



KEY:

AOPC4-UST-BOTTOM	
DEPTH	8
GRO	120
DRO	1900
HRO	1200
BTEX	ND
LEAD	ND

GASOLINE-RANGE ORGANICS — GRO
 DIESEL-RANGE ORGANICS — DRO
 HIGHER-RANGE ORGANICS — HRO
 BENZENE, TOLUENE, ETHYLBENZENE, TOTAL XYLENES — BTEX
 LEAD — LEAD

— SAMPLE NAME
 — IN FEET
 — RED INDICATES EXCEEDENCE OF MTCVA METHOD A CLEANUP LEVEL
 — **BOLD** INDICATES DETECTION

KEY:

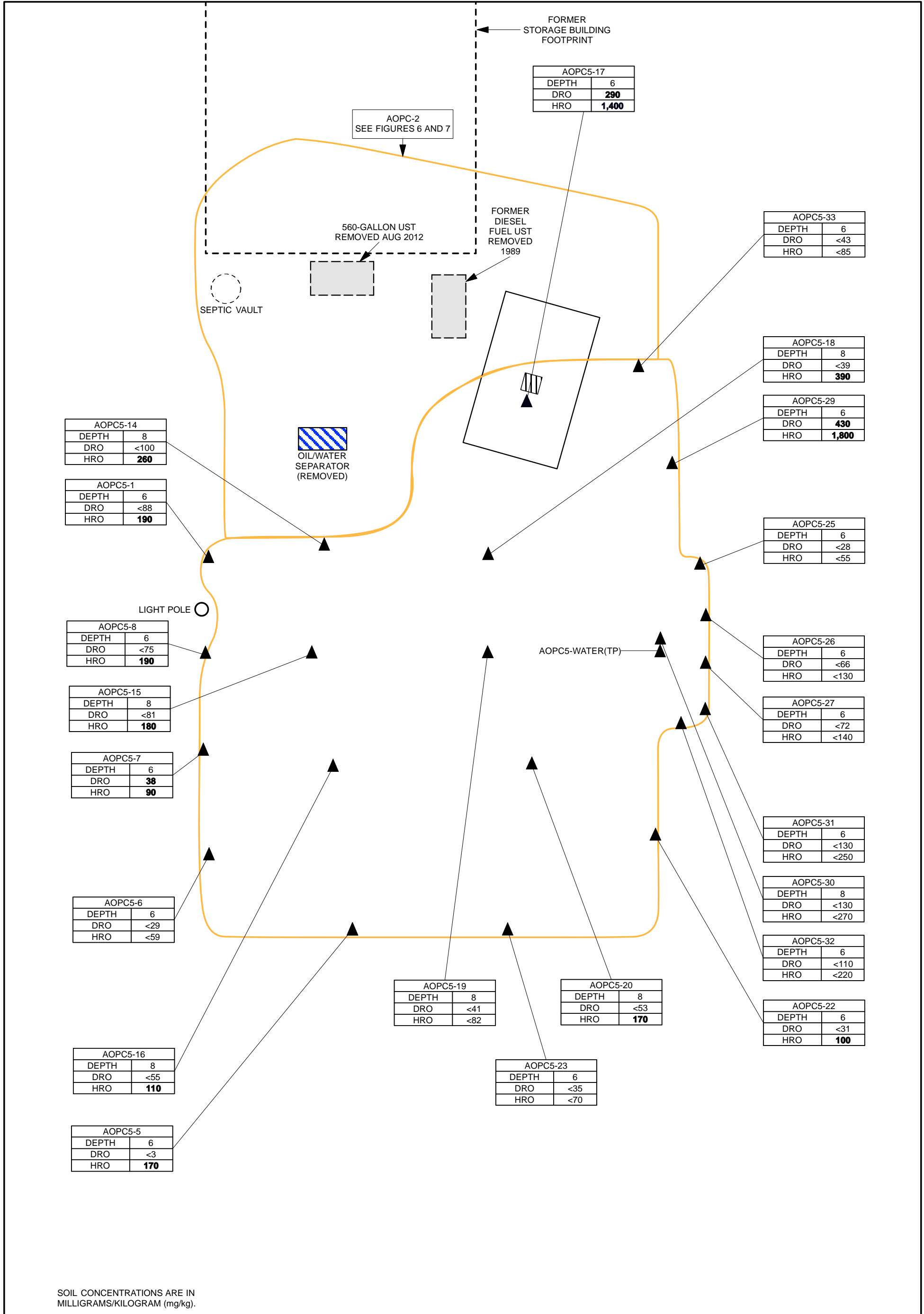
- FORMER UST LOCATIONS
- PROPERTY LINE
- SOIL BORING LOCATION COMPLETED 9/3/2010 (SB-8)
- SOIL BORING LOCATION COMPLETED 1/26/12 AND 1/27/12 (B-1)
- SOIL SAMPLING LOCATIONS

ept ENVIRONMENTAL PARTNERS INC
 295 NE Gilman Boulevard, Suite 201
 Issaquah, Washington 98027

FIGURE 1

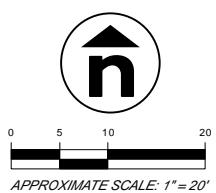
AOPC-4: LIMITS OF REMEDIAL EXCAVATION AND SOIL SAMPLING RESULTS

PROJECT	62401.1
PREPARED FOR	BUSS LLC
LOCATION	969 118TH AVENUE SE BELLEVUE, WASHINGTON
SHEET	DRAWN BY ALW
	REVIEWED BY GAM
	DATE 1/9/13



SOIL CONCENTRATIONS ARE IN MILLIGRAMS/KILOGRAM (mg/kg).

KEY:



- LIMITS OF REMEDIAL EXCAVATION
- FORMER UST LOCATIONS
- BOLD** CONCENTRATION DETECTED BUT BELOW MTCA METHOD A SOIL CLEANUP LEVEL (CUL)
- RED** CONCENTRATION ABOVE MTCA METHOD A SOIL CLEANUP LEVEL (CUL)
- DRAIN

epl ENVIRONMENTAL PARTNERS INC
 295 NE Gilman Boulevard, Suite 201
 Issaquah, Washington 98027

FIGURE 8

AOPC-5:
FINAL PERFORMANCE
SOIL SAMPLES

PROJECT	62401.1		
PREPARED FOR	BUSS LLC		
LOCATION	969 118TH AVENUE SE BELLEVUE, WASHINGTON		
SHEET	DRAWN BY	REVIEWED BY	DATE
7 of 8	ALW	GAM	1/9/13

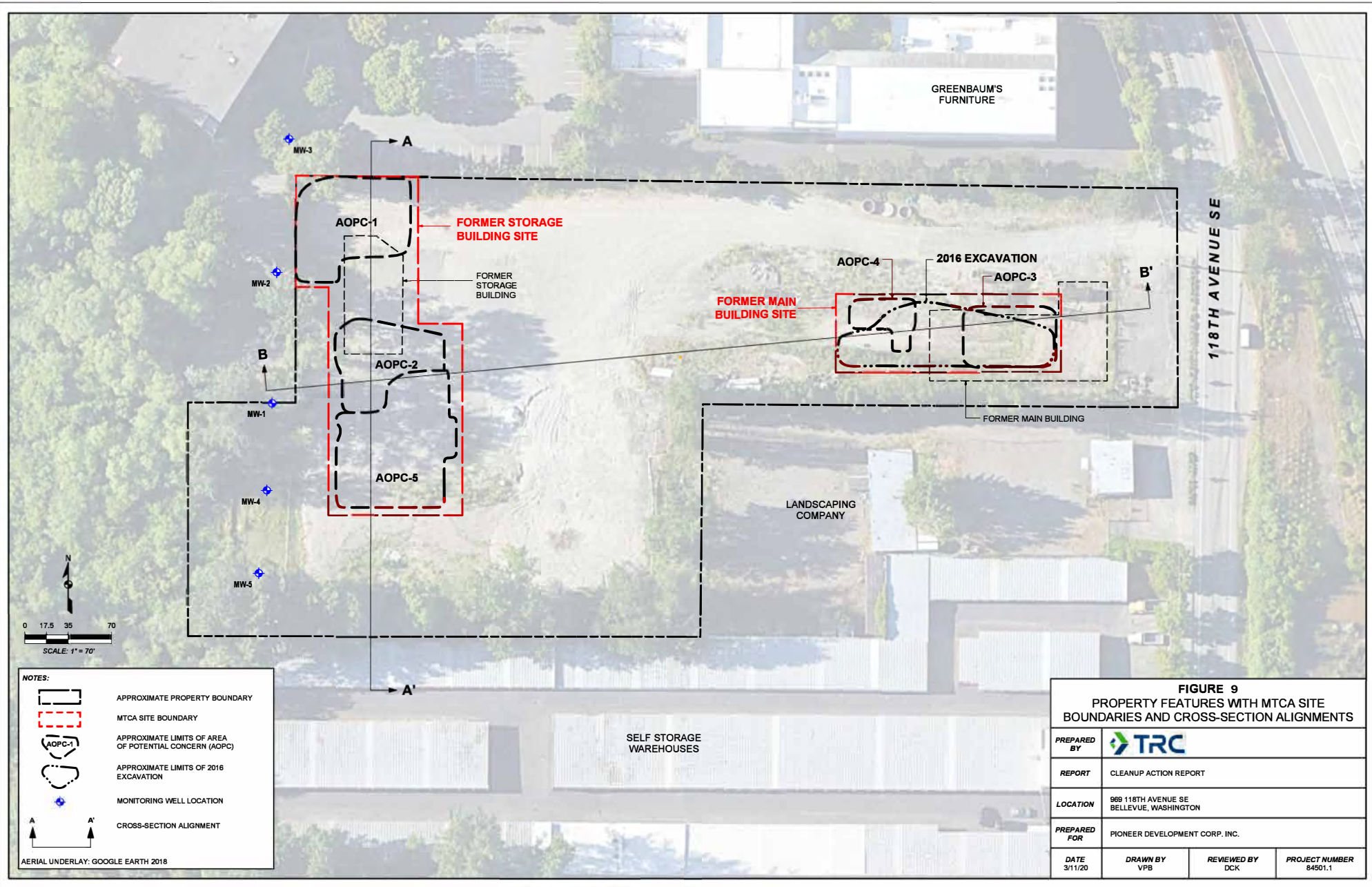


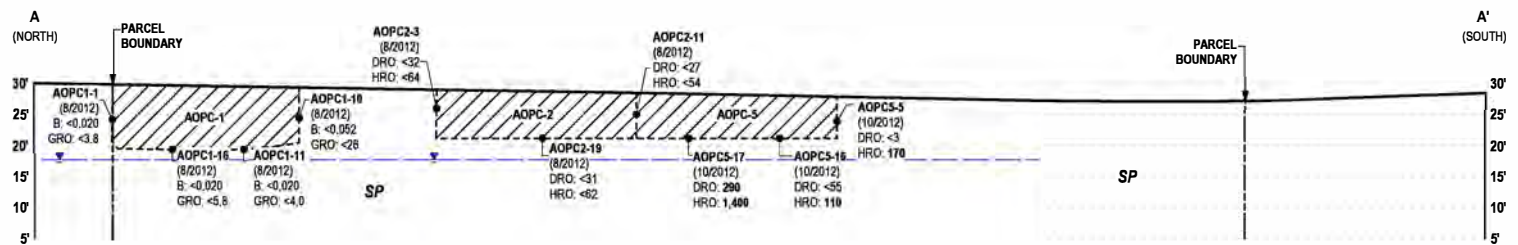
FIGURE 9
PROPERTY FEATURES WITH MTCA SITE
BOUNDARIES AND CROSS-SECTION ALIGNMENTS

PREPARED BY			
REPORT	CLEANUP ACTION REPORT		
LOCATION	989 118TH AVENUE SE BELLEVUE, WASHINGTON		
PREPARED FOR	PIONEER DEVELOPMENT CORP. INC.		
DATE	DRAWN BY	REVIEWED BY	PROJECT NUMBER
3/11/20	VPB	DCK	84501.1

NOTES:

- APPROXIMATE PROPERTY BOUNDARY
- MTCA SITE BOUNDARY
- APPROXIMATE LIMITS OF AREA OF POTENTIAL CONCERN (AOPC)
- APPROXIMATE LIMITS OF 2016 EXCAVATION
- MONITORING WELL LOCATION
- CROSS-SECTION ALIGNMENT

AERIAL UNDERLAY: GOOGLE EARTH 2018



NOTES:

<ul style="list-style-type: none"> ● AOPC1-1 (8/2012) B: <0.020 GRO: <3.8 	<p>SOIL SAMPLE LOCATION AND SAMPLE DATE WITH SELECTED ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM (mg/kg) OF SELECTED COMPOUNDS</p>	<p>SP POORLY GRADED SAND</p> <p>B BENZENE</p> <p>GRO GASOLINE-RANGE ORGANICS</p> <p>DRO DIESEL-RANGE ORGANICS</p> <p>HRO HIGHER-RANGE ORGANICS</p> <p>BOLD SAMPLE RESULT EXCEEDS LABORATORY DETECTION LIMIT</p> <p>< COMPUND NOT DETECTED AT A CONCENTRATION EXCEEDING LABORATORY REPORTING LIMIT SHOWN</p>
	<p>AREA OF POTENTIAL CONCERN (AOPC)</p>	
	<p>GROUNDWATER ELEVATION AT TIME OF DRILLING</p>	

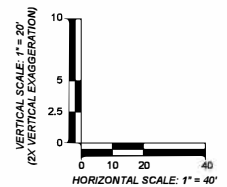
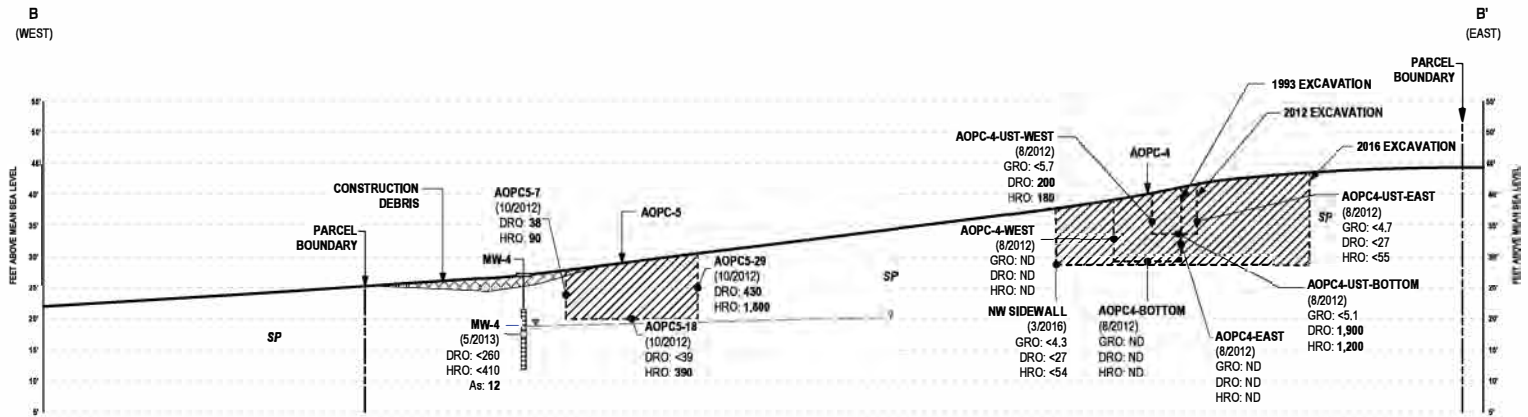


FIGURE 10 CROSS-SECTION A-A'			
PREPARED BY			
REPORT	CLEANUP ACTION REPORT		
LOCATION	989 118TH AVENUE SE BELLEVUE, WASHINGTON		
PREPARED FOR	PIONEER DEVELOPMENT CORP. INC.		
DATE 3/11/20	DRAWN BY VPB	REVIEWED BY DCK	PROJECT NUMBER 84501.1



NOTES:			
● AOPC5-7 (10/2012) B: ND GRO: ND	SOIL SAMPLE LOCATION AND SAMPLE DATE WITH SELECTED ANALYTICAL RESULTS IN MILLIGRAMS PER KILOGRAM (mg/kg) FOR SELECTED COMPOUNDS	As	ARSENIC
○ MW-4 (5/2013) DRO: <260 µg/L HRO: <410 µg/L As: 12 µg/L	GROUNDWATER SAMPLE LOCATION WITH ANALYTICAL RESULTS IN MICROGRAMS PER LITER (µg/L) FOR SELECTED COMPOUNDS	GRO	GASOLINE-RANGE ORGANICS
	REMEDIAL EXCAVATION	DRO	DIESEL-RANGE ORGANICS
	GROUNDWATER ELEVATION AT TIME OF DRILLING	HRO	HIGHER-RANGE ORGANICS
SP	POORLY GRADED SAND	ND	COMPOUND NOT DETECTED AT A CONCENTRATION EXCEEDING UNKNOWN LABORATORY REPORTING LIMITS
		<	COMPOUND NOT DETECTED AT A CONCENTRATION EXCEEDING LABORATORY REPORTING LIMIT SHOWN
		BOLD	SAMPLE RESULT EXCEEDS LABORATORY REPORTING LIMIT

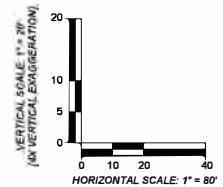
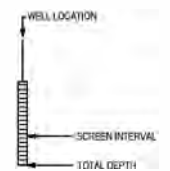
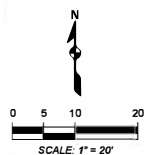
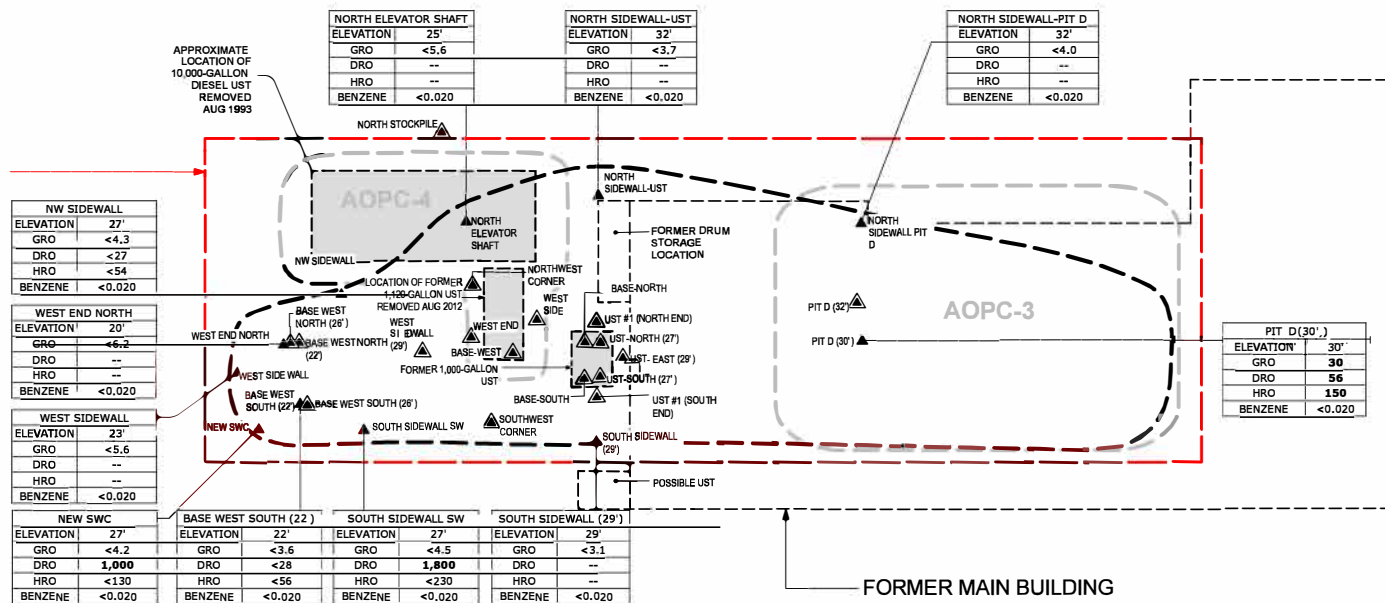


FIGURE 11 CROSS-SECTION B-B'			
PREPARED BY			
REPORT	CLEANUP ACTION REPORT		
LOCATION	989 118TH AVENUE SE BELLEVUE, WASHINGTON		
PREPARED FOR	PIONEER DEVELOPMENT CORP. INC.		
DATE	DRAWN BY	REVIEWED BY	PROJECT NUMBER
3/11/20	VPB	DCK	84501.1

FORMER MAIN BUILDING SITE



NOTES:

- FINAL SAMPLE LOCATION
- SAMPLE LOCATION THAT WAS OVER-EXCAVATED, SEE TABLE 12 FOR DATA
- LIMITS OF REMEDIAL EXCAVATION
- APPROXIMATE PROPERTY BOUNDARY
- MTCA SITE BOUNDARY
- APPROXIMATE LIMIT OF AREA OF POTENTIAL CONCERN (AOPC)
- FORMER UNDERGROUND STORAGE TANK (UST) LOCATIONS

KEY:

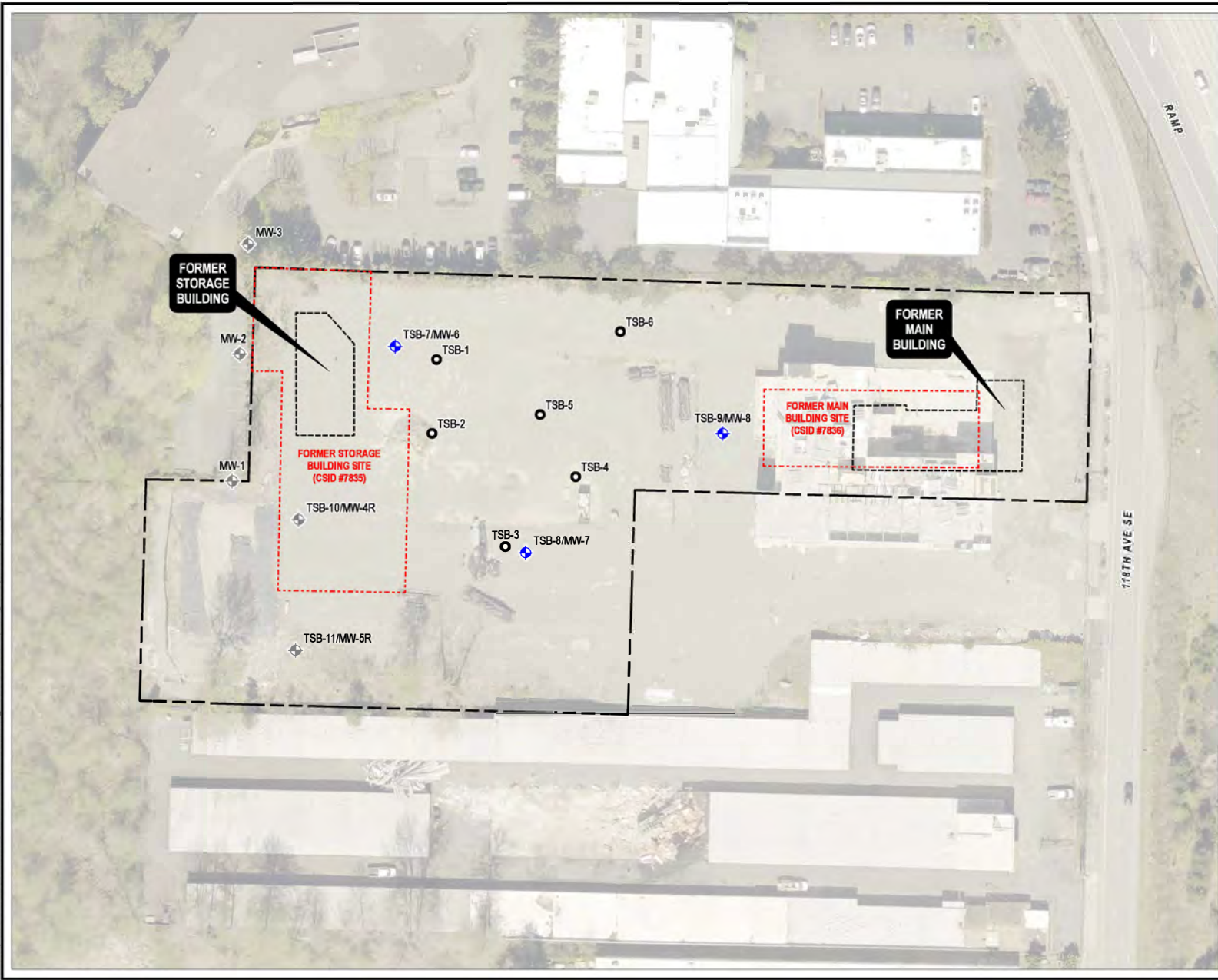
SOIL CONCENTRATIONS ARE IN MILLIGRAMSKILOGRAM (mg/kg).

Location	Elevation	GRO	DRO	HRO	BENZENE
SOUTH SIDEWALL SW	27'	<4.5	1,800	<230	<0.020

NOT SAMPLED FOR ASSOCIATED COMPOUND

FIGURE 12 FORMER MAIN BUILDING SITE: LIMITS OF 2016 REMEDIAL EXCAVATION AND SOIL ANALYTICAL RESULTS			
PREPARED BY			
REPORT	CLEANUP ACTION REPORT		
LOCATION	989 118TH AVENUE SE BELLEVUE, WASHINGTON		
PREPARED FOR	PIONEER DEVELOPMENT CORP. INC.		
DATE	DRAWN BY	REVIEWED BY	PROJECT NUMBER
3/11/20	VPB	DCK	84501.1

Cooperative Systems, M/D 1180 23rd Avenue, Washington, WA 98072, 425.395.0010
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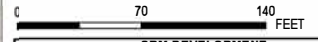
- ◆ MONITORING WELL LOCATION
- ◆ MONITORING WELL LOCATION (USED FOR EVALUATION OF PIEZOMETRIC CONDITIONS ONLY)
- DIRECT-PUSH TECHNOLOGY (DPT) SOIL BORING LOCATION
- APPROXIMATE SUBJECT PROPERTY BOUNDARY
- FORMER BUILDING FOOTPRINT
- MTCa SITE BOUNDARY

NOTES:
 CSID = CLEANUP SITE ID.
 MTCa = MODEL TOXICS CONTROL ACT.

 BASE MAP: KING COUNTY, ARCGIS ONLINE (2021).
 DATA SOURCES: TRC, PROPERTY BOUNDARY AND STREET NAMES FROM KING COUNTY, ARCGIS ONLINE (2021).



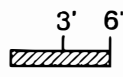
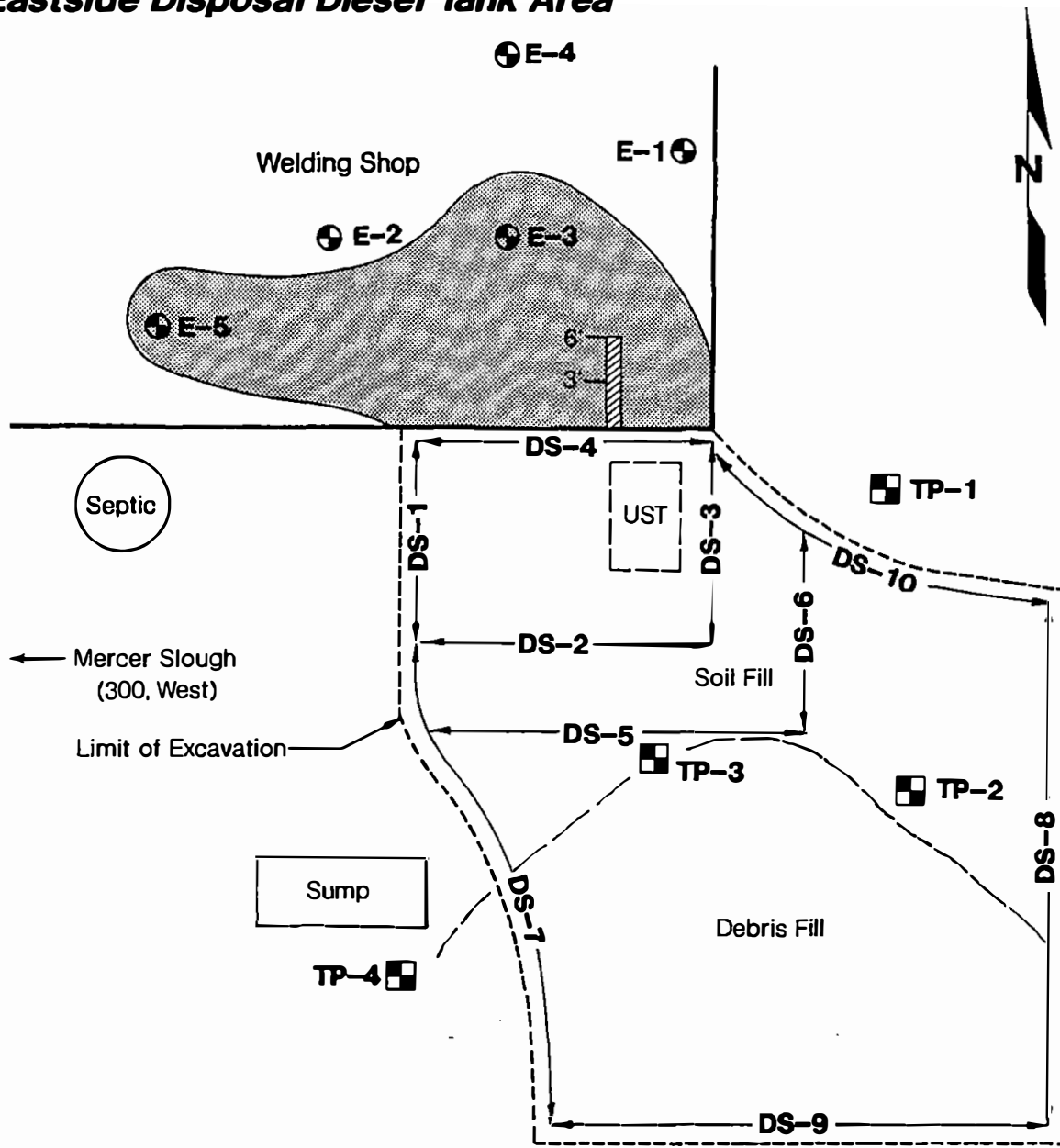
1:840
1" = 70'



PROJECT: SRM DEVELOPMENT FORMER EASTSIDE DISPOSAL SITE 969 118TH AVENUE SOUTHEAST BELLEVUE, WASHINGTON	
TITLE: SUBJECT PROPERTY REPRESENTATION DATA GAPS INVESTIGATION REPORT	
DRAWN BY: S. RAY	PROJ. NO.: 471241.0000.0000
FIGURE 15	
CHECKED BY: J. WINDSOR APPROVED BY: J. SHERROD DATE: OCTOBER 2023	
 1180 NW MAPLE STREET, SUITE 310 ISSAQUAH, WA 98027 PHONE: 425.395.0010 	
FILE: Data Gaps Investigation Report.aprx	

Excavation and Sample Location Map

Eastside Disposal Diesel Tank Area



NWES Sample Location



E-1 Hart Crowser Hand Auger Sample Location and Number



TP-1 Test Pit Location and Number

DS-1

Sidewall Sample Location and Number



Estimated Extent of Contamination

TP-5 (100' South)

0 10 20

Scale in Feet

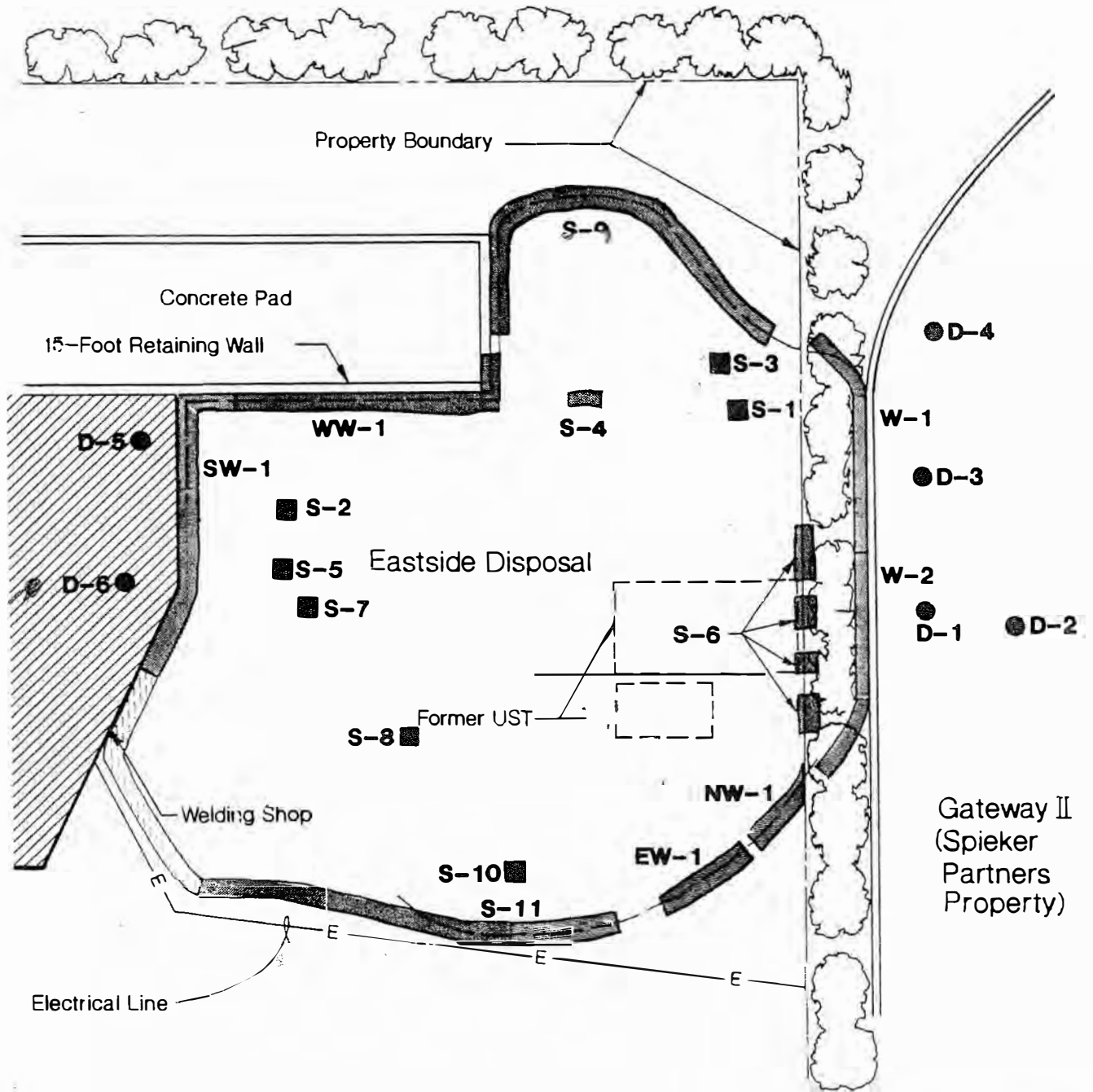


HARTCROWSER

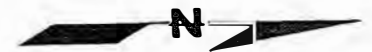
J-2616-03 4/90

Figure 16

Verification Sampling Location Plan



- D-1 Boring Location and Number
- S-1 Spot Sample Location and Number
- ▬ W-1 Excavation Limit and Side Wall Verification Sample Location and Number
- ▬ No Verification Sample
(Excavation backfilled immediately due to the possibility of damage to building and utility. Field screening did not indicate the presence of gasoline residues.)



NOT TO SCALE

HARTCROWSER

J-2616-02 3/90

Figure 17

Appendix B

Documents List

Documents List

1. Hart Crowser, *Gasoline Storage Tank Removal*, March 14, 1990
2. Hart Crowser, *Diesel Tank Remediation*, June 21, 1990
3. Environmental Partners, Inc. (EPI), *Additional Subsurface Investigation Report*, May 3, 2012
4. EPI, *Draft Remedial Action Work Plan*, May 3, 2012
5. EPI, *Remedial Action Report*, January 11, 2013
6. EPI, *Monitoring Well Installation and Sampling*, June 17, 2013
7. Stantec, *Underground Storage Tank Closure and Remedial Action Report*, June 10, 2016
8. TRC Environmental (TRC), *Cleanup Action Report*, March 11, 2020
9. TRC, *Data Gaps Investigation Work Plan*, August 2, 2021
10. TRC, *Groundwater Monitoring Report*, November 16, 2023
11. TRC, *Data Gaps Investigation Report*, November 16, 2023

Appendix C

Earlier Site Characterization

Earlier Site Characterization

In October of 1989, six borings were installed, four on the adjoining property and two under the welding shop (Former Storage Building). Eight soil samples were collected and analyzed for benzene, ethylbenzene, toluene, and xylene. All samples were below the Site cleanup level or non-detect for all analytes except for two samples with exceedances of benzene, one on the adjoining property and one beneath the welding shop.

In February of 1990, five test pits were excavated on site. A soil sample from each pit was analyzed for total petroleum hydrocarbons by one of two methods. One concentration exceeded the current cleanup level for diesel, and three other samples had detections of total petroleum hydrocarbons.

In September of 2010, eight soil borings were installed onsite, with five samples analyzed for gasoline, four for diesel and oil, and three for benzene, ethylbenzene, toluene, and xylene. Two other samples were also analyzed for other volatile organic compounds besides those four.

Appendix C, Table 1 – Soil samples – 2010

Contaminant	MTCA Method A/B Cleanup Level (mg/kg)	Maximum Concentration (mg/kg)	Number of Exceedances/ Number of Samples	Number of Detections/ Number of Samples
Gasoline	30/100	1200	2/5	2/5
Diesel	2,000	16,000	2/4	4/4
Oil	2,000	None	0/4	0/4
Benzene	0.03	0.05	1/5	3/5
Ethylbenzene	6	none	0/5	0/5
Toluene	7	0.05	0/5	1/5
Xylene	9	2.7	0/5	2/5

mg/kg = milligrams per kilogram.

One sample had no detections of any contaminate while the other had detections of isopropylbenzene, n-propylbenzene, 1,3,5-trimethylbenzene, 1,2,4-trimethylbenzene, sec-butylbenzene, n-butylbenzene, isopropyltoluene, and naphthalene. The concentrations of isopropyltoluene, 1,3,5-trimethylbenzene, and naphthalene exceeded their current Site cleanup levels. Grab groundwater samples from two borings were analyzed for diesel and oil.

Neither diesel nor oil were detected in either sample. Grab groundwater samples from two other soil borings were analyzed for gasoline, benzene, ethylbenzene, toluene, and xylene.

Appendix C, Table 2. Groundwater samples - 2010

Contaminant	MTCA Method A/B Cleanup Level (µg/L)	Maximum Concentration (µg/L)	Number of Exceedances/ Number of Samples	Number of Detections/ Number of Samples
Gasoline	800	25,000	2/2	2/2
Diesel	500	none	0/2	0/2
Oil	500	none	0/2	0/2
Benzene	5	330	1/2	1/2
Ethylbenzene	700	500	0/2	1/2
Toluene	1,000	220	0/2	1/2
Xylene	1,000	770	0/2	1/2

µg/L = micrograms per liter.

In January of 2012, nineteen soil borings were installed onsite. Twelve soil samples were analyzed for hydrocarbon identification, with gasoline, diesel, and oil being detected in one sample and oil being detected in a second sample. Seven samples were further analyzed for diesel and oil, three samples were analyzed for gasoline, and four samples were analyzed for benzene, ethylbenzene, toluene, and xylene.

Benzene, ethylbenzene, toluene and xylene were not detected in any of the four samples. Gasoline was detected in two of three samples, with both concentrations exceeding the site cleanup level. Diesel was detected in two of seven samples and oil in three of seven samples, with only two of the oil sample concentrations exceeding the site cleanup level.

Five samples were analyzed for volatile organic compounds, four for polychlorinated biphenyls, and two for lead. Volatile organic compounds (except for one detection of tetrachloroethene) and polychlorinated biphenyls were not detected in any sample. Lead was detected in one sample, at concentrations below the Site cleanup level.

Appendix C, Table 3. Soil Samples – 2012

Contaminant	MTCA Method A/B (mg/kg)	Maximum Concentration (mg/kg)	Number of Exceedances/ Number of Samples	Number of Detections/ Number of Samples
Gasoline	30/100	880	2/3	2/3
Diesel	2,000	1,000	0/7	2/7
Oil	2,000	9,400	2/7	3/7

Contaminant	MTCA Method A/B (mg/kg)	Maximum Concentration (mg/kg)	Number of Exceedances/ Number of Samples	Number of Detections/ Number of Samples
Benzene	0.03	none	0/4	0/4
Ethylbenzene	6	none	0/4	0/4
Toluene	7	none	0/4	0/4
Xylene	9	none	0/4	0/4

Five grab groundwater samples were analyzed, four for gasoline and one for diesel and oil. Four samples were analyzed for benzene, ethylbenzene, toluene, and xylene and two for volatile organic compounds and lead. Lead was detected in both samples, with one concentration exceeding the Site cleanup level.

1,3,5-trimethylbenzene, 1,2,4-trimethylbenzene, n-propylbenzene, isopropylbenzene, n-butylbenzene, and naphthalene were detected in one of two samples analyzed for volatile organic compounds. 1,2-dibromoethane, 1,2-dichloroethane, and methyl tertiary butyl ether were not detected in either of the two samples analyzed for them.

Benzene, ethylbenzene, toluene, and xylene were detected in two of the four samples tested, with both benzene concentrations and one ethylbenzene concentration exceeding the Site cleanup level. Diesel and oil were not detected in the one sample analyzed for them. Gasoline was detected in two of four samples, with both concentrations exceeding the Site cleanup level.

In February of 2013, three groundwater monitoring wells were installed on the west (downgradient) side of the Site. A groundwater sample was collected from each well and analyzed for gasoline, diesel, oil, benzene, ethylbenzene, toluene, and xylene. Gasoline, diesel, oil, ethylbenzene, toluene, and xylene were not detected in any sample. Benzene was detected in one well at 1.4 µg/L, below the Site cleanup level of 5 µg/L.

In May of 2013, two additional monitoring wells were installed on the west (downgradient) side of the Site. A groundwater sample was collected from each well and analyzed for diesel, oil, arsenic, cadmium, chromium, lead, and mercury. Diesel, oil, cadmium, chromium, lead, and mercury were not detected in either sample. Arsenic was detected in both samples, at concentrations of 8.2 µg/L and 12 µg/L, slightly exceeding the Site cleanup level of 5 µg/L. As a layer of peat was present, the elevated arsenic concentrations were considered due to the increased solubility of arsenic in the presence of peat.